



Environmental Protection

Department of Toxic Substances Control



Maureen F. Gorsen, Director 8800 Cal Center Drive Sacramento, California 95826-3200

December 22, 2006

Mr. Brownell Turner Commander's Representative Riverbank Army Ammunition Plant 5300 Claus Road Riverbank, California 95367-0856

CLOSURE CERTIFICATION OF THE FLUORESCENT TUBE CRUSHER, RIVERBANK ARMY AMMUNITION PLANT, STANISLAUS COUNTY, ENVIRONMENTAL PROTECTION AGENCY ID NO. CA210020759

Dear Mr. Turner:

The California Department of Toxic Substances Control (DTSC), Northern California Permitting and Corrective Action Branch has received the <u>Closure Report for Fluorescent Tube Crusher</u> (Closure Report), dated October 20, 2006, and prepared by NI Industries, Inc. The Report was submitted in order to certify closure of Fluorescent Tube Crusher in compliance with the closure plans that are part of the Hazardous Waste Facility Permit Renewal Application, dated November 2004. The Closure Report consists of closure procedures, closure activities, analytical results on wipe samples, photographs, and third-party certification that the closure was performed in accordance with the approved Closure Plans.

The Fluorescent Tube Crusher operated under a Hazardous Waste Facility Permit issued on July 30, 1995 by DTSC. The closure activities were supposed to follow the procedures specified in the November 2004 permit application. These closure activities included the following:

- Remove the crusher device from the collection container,
- Place the carbon filter and particulate filter in the collection container,
- Seal the collection container and transport it to the permitted Drum Storage Facility,
- Steam clean the crusher device and filter housing with an alkaline soap solution and rinse with water, and
- Wipe sample the concrete pad and analyze the sample for mercury.

Mr. Brownell Turner December 22, 2006 Page 2

After removing the hazardous waste, steam cleaning the equipment, and sampling and analyzing the wipe samples, Complere Engineering Group, Inc. (third-party consultant) and NI Industries, Inc. certified that the closure activities of the Fluorescent Tube Crusher were performed in accordance with RCRA requirements and the approved closure plans.

After reviewing the Closure Report (see enclosure), DTSC has determined that Riverbank Army Ammunition Plant has performed all of the closure activities, in accordance with the approved closure plans. Furthermore, DTSC acknowledges that the concrete surface immediately beneath the Fluorescent Tube Crusher was appropriately sampled and analyzed and determined to be clean of any mercury contamination. This acknowledgement is based on the representation that the information submitted as well as any other information provided to DTSC to use as basis for this decision is true and accurate. Any inaccuracies found in such information may be grounds for subsequent nullification of the Closure Certification and potential enforcement action. The owner/operator must inform DTSC of any deviations from or changes in the information provided which would affect the Closure Certification of the Fluorescent Tube Crusher.

Please be advised that this acknowledgement is not a certification that the closed Fluorescent Tube Crusher does not pose any environmental or public health threat. This letter does not remove any liability associated with the past hazardous waste management practices, which occurred in and adjacent to this unit. This acknowledgement does not limit or preclude any future investigation of any other on-site operation by any agency, nor does it limit or preclude any corrective action deemed necessary for closure or remediation of any solid waste management units adjacent to the previous location of the Fluorescent Tube Crusher.

Also, pursuant to the California Code of Regulations, title 22, section 66264.143(j)(1), DTSC is notifying Riverbank Army Ammunition Plant that it no longer is required to maintain financial assurance for the closure of the Fluorescent Tube Crusher.

Mr. Brownell Turner December 22, 2006 Page 3

If you have any questions, please give Mr. Robert Crandall, Section Chief, of my staff, a call at (916) 255-3777.

Sincerely,

//original signed by//

James M. Pappas, P.E., Chief Northern California Permitting and Corrective Action Branch

Enclosure

cc: Mr. Jim Simpson, Program Manager Stanislaus County Environmental Resources 3800 Cornucopia Way, Suite C Modesto, California 95358

Mr. Alex Macdonald
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

Mr. Robert A. Crandall Section Chief Northern California Permitting and Corrective Action Branch 8800 Cal Center Drive Sacramento, California 95826

Mr. Paul Kewin Supervising Hazardous Substances Scientist Statewide Compliance Division 8800 Cal Center Drive Sacramento, California 95826

Mr. Keith Kihara Statewide Compliance Division 8800 Cal Center Drive Sacramento, California 95826 Mr. Brownell Turner December 22, 2006 Page 4

cc: Ms. Bev Rikala.

Hazardous Substances Engineer Northern California Permitting and Corrective Action Branch Hazardous Waste Management Program 8800 Cal Center Drive Sacramento, California 95826

JP06W.126



NI INDUSTRIES, INC.

5300 CLAUS ROAD • P.O. BOX 856 • RIVERBANK, CA 95367-0856 • (209) 529-8100 • FAX (209) 869-7285

RIVERBANK ARMY AMMUNITION PLANT a TriMas Company

November 15, 2006

Mr. John Papathakis

California Environmental Protection Agency Department of Toxic Substances Control 8800 Cal Center Drive Sacramento, CA 95826-3200

SUBJECT: Closure Report for Fluorescent Tube Crusher.

Dear Mr. Papathakis:

NI Industries, Inc., (NI) the operating contractor of the Riverbank Army Ammunition Plant (RBAAP), hereby submits the attached Closure Report for the Fluorescent Tube Crusher. This unit was operated under the previous Hazardous Waste Facility Permit 97-NC-012 and closed in accordance with the current DTSC-approved RBAAP Operation Plan and Hazardous Waste Facility Permit 05-SAC-06.

The Closure Report for the Fluorescent Tube Crusher was reviewed and certified by an independent Registered Professional Engineer, in accordance with 22CCR §66264.115. NI requests written acknowledgement of your approval of this Closure Report. If you have any questions, please contact Anthony Mendes, Environmental Manager at (209) 869-7276.

Sincerely.

NUMBUSTRIES, INC

//original signed by//

Winifred T. Wu Genera(Manager

AM

Attachment:

Closure Report for Fluorescent Tube Crusher, October 20, 2006

CC:

L. Peterson, DTSC Compliance Division

B. Turner, COR

A. Mendes

Subject File

Chrono File

Reading File

PC

CLOSURE REPORT

FLUORESCENT TUBE CRUSHER

RIVERBANK ARMY AMMUNITION PLANT NI INDUSTRIES, INC.

5300 Claus Road Riverbank, California 95367

October 20, 2006

The Riverbank Army Ammunition Plant (RBAAP), owned by the Department of the Army and operated by NI Industries, Inc. (NI), has performed hazardous waste management operations under a RCRA Part B Hazardous Waste Facility Permit for many years. RBAAP is currently operating under Hazardous Waste Facility Permit 05-SAC-06, which was issued by the California Environmental Protection Agency Department of Toxic Substances Control (DTSC) on April 6, 2006. This permit became effective on May 6, 2006 and expires on May 6, 2016.

Under the previous Hazardous Waste Facility Permit 97-NC-012, RBAAP was permitted to operate a Fluorescent Tube Crusher. This unit consisted of a grinder mounted on an enclosure that fit over a standard 55-gallon steel drum, which was exhausted through a particulate filter and a carbon adsorption filter. This unit is illustrated in **Figure 1**. At the request of DTSC, RBAAP agreed to discontinue use of the Fluorescent Tube Crusher and close the unit. The Operation Plan for Hazardous Waste Treatment and Storage Facility that was submitted to DTSC as part of the application for permit renewal in December 2004 identified the Closure Plan for the unit. In accordance with California regulations, issuance of the new permit constituted approval of the Operation Plan and the included Closure Plan on that date, subject to any revisions may have been made during the permit approval process. The applicable sections of the approved Closure Plan, excerpted from the Operation Plan, are as follows:

11.1.2.12 Fluorescent Tube Crusher

The crusher device will be removed from the collection container. The associated carbon filter and particulate filter will be placed in the collection container. The container will be sealed and transported to the Drum Storage Facility. The crusher device and the filter housing will be steam-cleaned with an alkaline soap solution and rinsed with water. One (1) surface sample of the concrete pad will be collected and analyzed for mercury in accordance with the applicable procedure in Attachment 11-1.

Attachment 11-1

GENERAL

Independent of the type of sample to be collected, certain sample collection procedures will be required. First, documentation of sample collection will be maintained in a bound logbook. For each sample, an accurate description of the sample type, location, identification and characteristics will be recorded. The date, time, and the name of the individual collecting the sample will be noted in the logbook.

Following sample collection, sample information will be recorded on the label applied to the laboratory certified clean container and on the chain-of-custody form. This form will accompany the samples to the laboratory and provides

documentation of sample custody. Chain-of-custody tape will be placed on each sample container as well as the shipping container to provide documentation that the samples remained unopened during shipment.

Samples will be shipped in such a manner as to maintain their integrity. Samples will be packed in the shipping container with packing material, such as vermiculite, to minimize breakage. Ice will be placed in the shipping container so that samples will be maintained at 4 °C. Following sample collection, equipment used for sampling will be decontaminated or, if designed for a single use, disposed properly. The goal of decontaminating sampling equipment is to prevent the cross-contamination of materials at one location with materials from another. Outer gloves worn by sampling personnel will be removed and discarded between samples to minimize the potential for cross-contamination of samples by contact with the gloves. Any solution generated during decontamination of sampling equipment will be properly disposed

Closure activity for the Fluorescent Tube Crusher was performed on April 25, 2006 in accordance with the approved Closure Plan. Illustrations of the activities are shown on the attached figures:

- Figure 2: Environmental Technicians begin dismantling the unit
- Figure 3: The filter for large particulate is removed from the housing
- Figure 4: The filter for small particulate is removed from the housing
- Figure 5: The filters are placed in a hazardous waste disposal container
- Figure 6: The Hazardous Waste label on the container with the particulate filters
- Figure 7: The carbon adsorption filter is placed in a hazardous waste disposal container
- Figure 8: The Hazardous Waste label on the container with the carbon adsorption filter
- Figure 9: The grinder enclosure and the filter housing are being decontaminated in the Equipment Wash Facility, identified as Unit #5 on Hazardous Waste Facility Permit 05-SAC-06

A surface sample of the concrete pad that the Fluorescent Tube Crusher was located on was taken on June 9, 2006. A surface sample of another concrete pad located in the nearby area was also taken as background blank. These samples were sent to GeoAnalytical Laboratories, Inc., a state-certified laboratory. A copy of the Chain of Custody documentation and the analytical results are enclosed as **Attachment 1**. The sample result was ND (non-detect) for mercury at a reporting limit (RL) of 0.1 mg/kg.

The two hazardous waste containers were transported from RBAAP under State of

Closure Plan – Fluorescent Tube Crusher October 20, 2006 Page 4 of 4

California Uniform Hazardous Waste Manifest Number 24967344 on July 12, 2006 and received at Clean Harbors Aragonite LLC in Aragonite, Utah on July 28, 2006. The two containers are listed on Page 2 of 2, Item 28.b. A copy of the Hazardous Waste Manifest is enclosed as **Attachment 2**.

Post-closure care is not required for the Fluorescent Tube Crusher. In accordance with Title 22 of the California Code of Regulations, §66264.115, the following closure certifications are documented herein:

This Closure Report was prepared by Anthony Mendes, Environmental Manager, NI Industries, Inc. I hereby certify that closure of the Fluorescent Tube Crusher was performed under my supervision, in accordance with the RBAAP Operation Plan and the Closure Plan as approved by DTSC.

//original signed by//

Anthony Mendes

Environmental Manager

NI Industries, Inc.

10/23/2006

I hereby certify that I am a Registered Professional Engineer in the State of California, and that I am independent of both the Department of the Army and of NI Industries, Inc. I have reviewed this Closure Report and hereby certify that closure of the Fluorescent Tube Crusher was performed in accordance with the RBAAP Operation Plan and the Closure Plan as approved by DTSC.

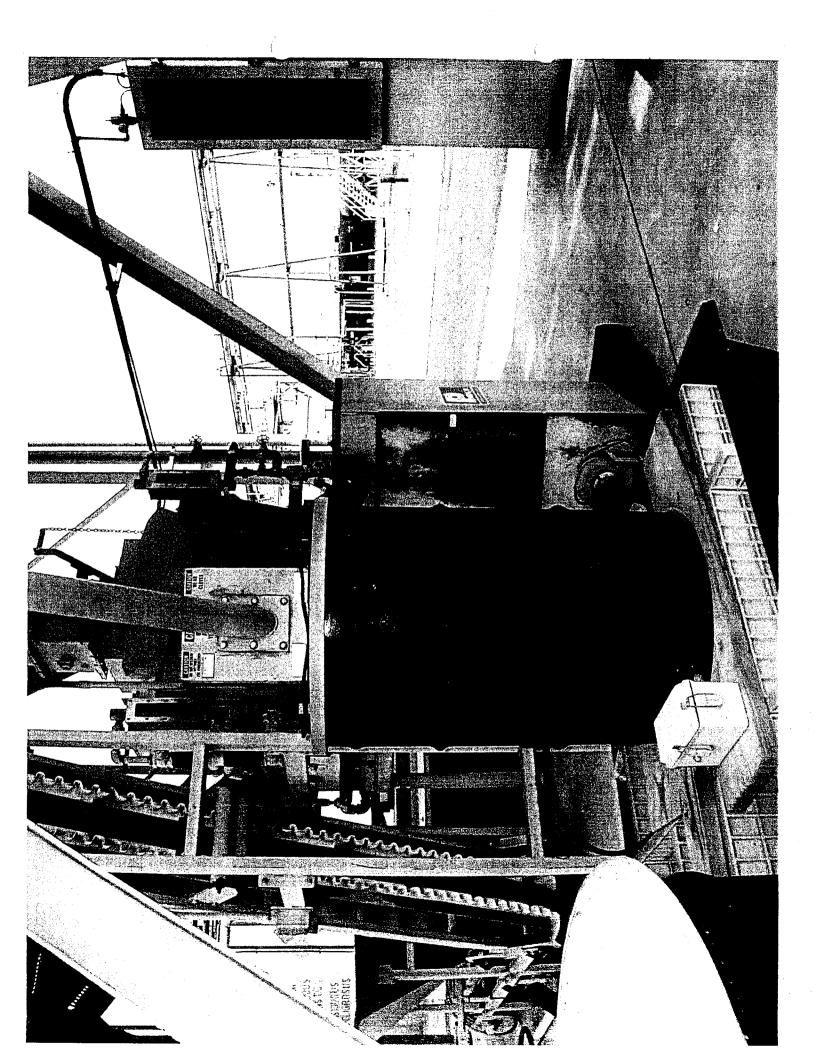
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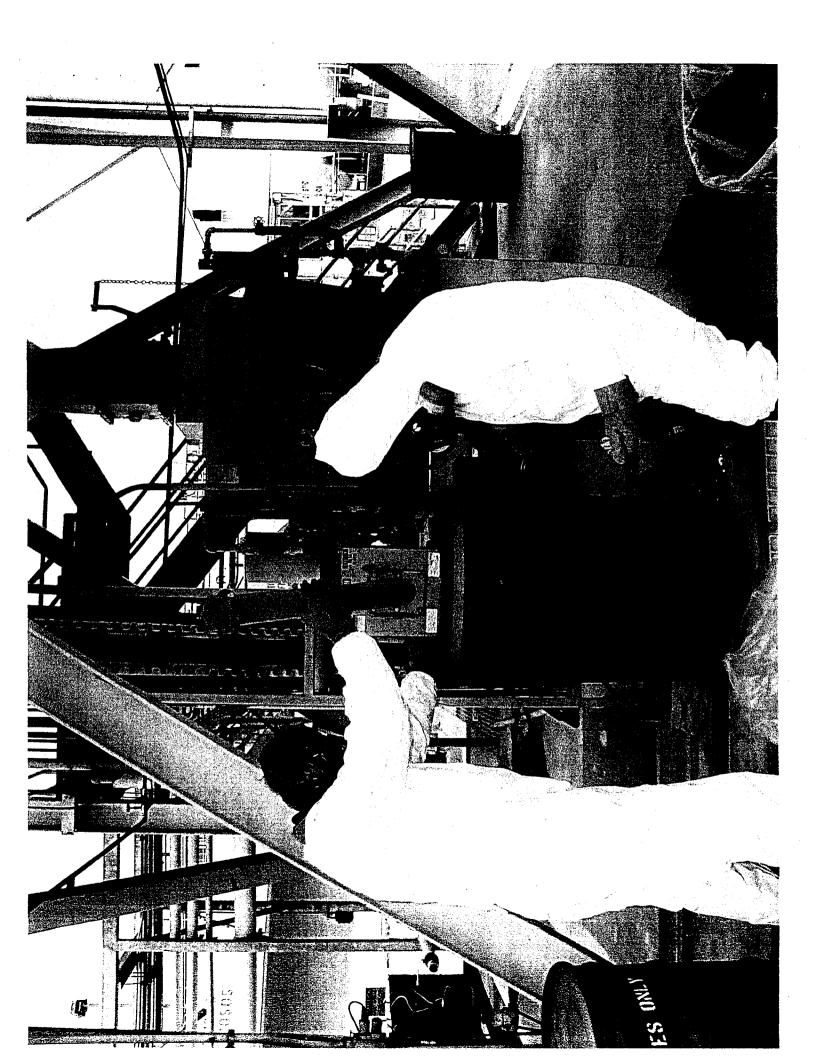
Eugene G. Wilkins Engineering Manager

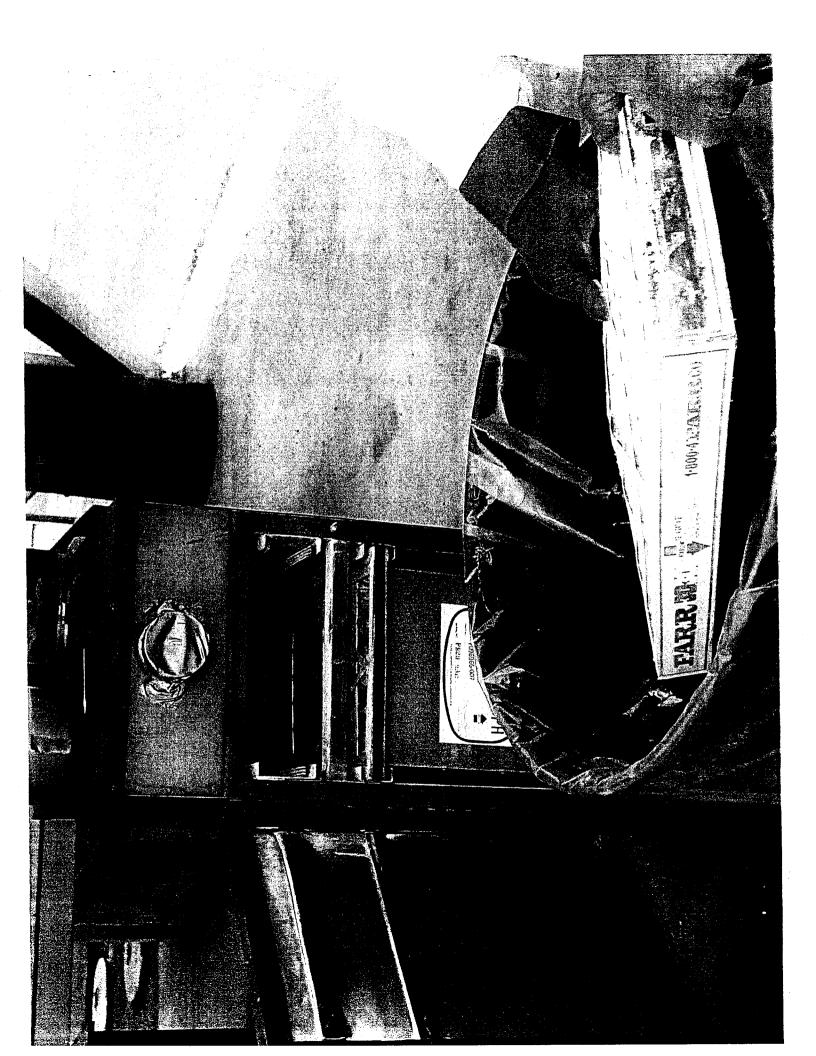
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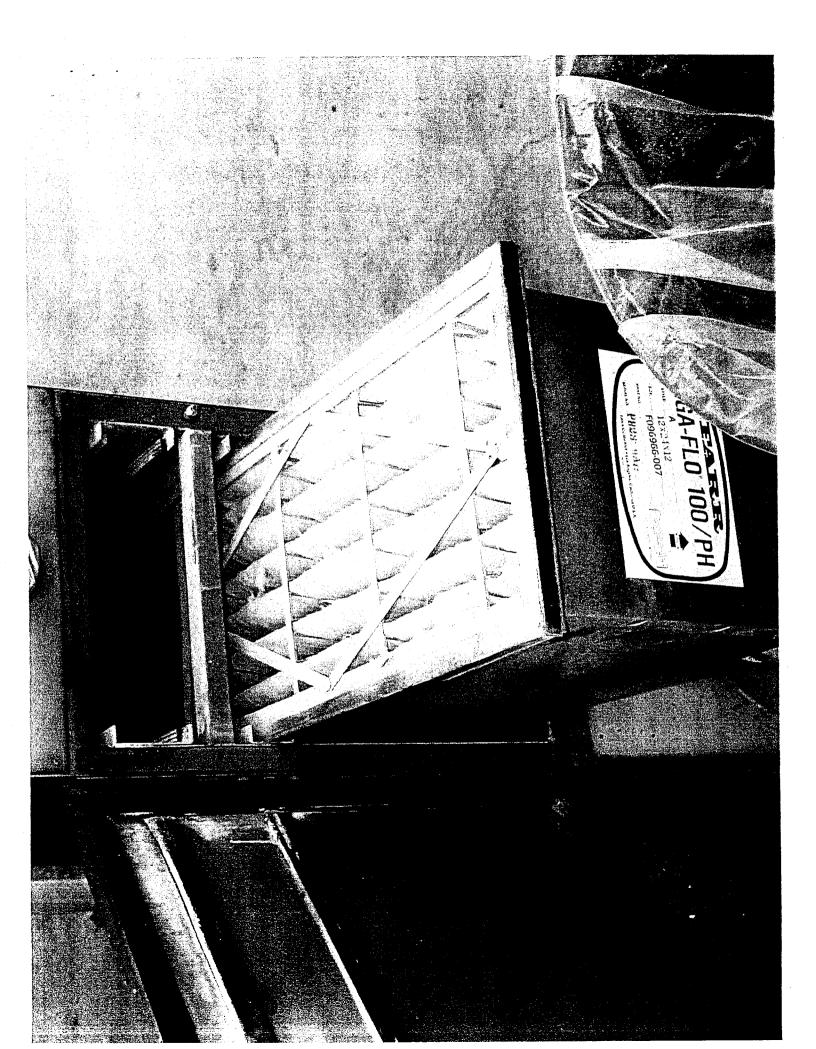
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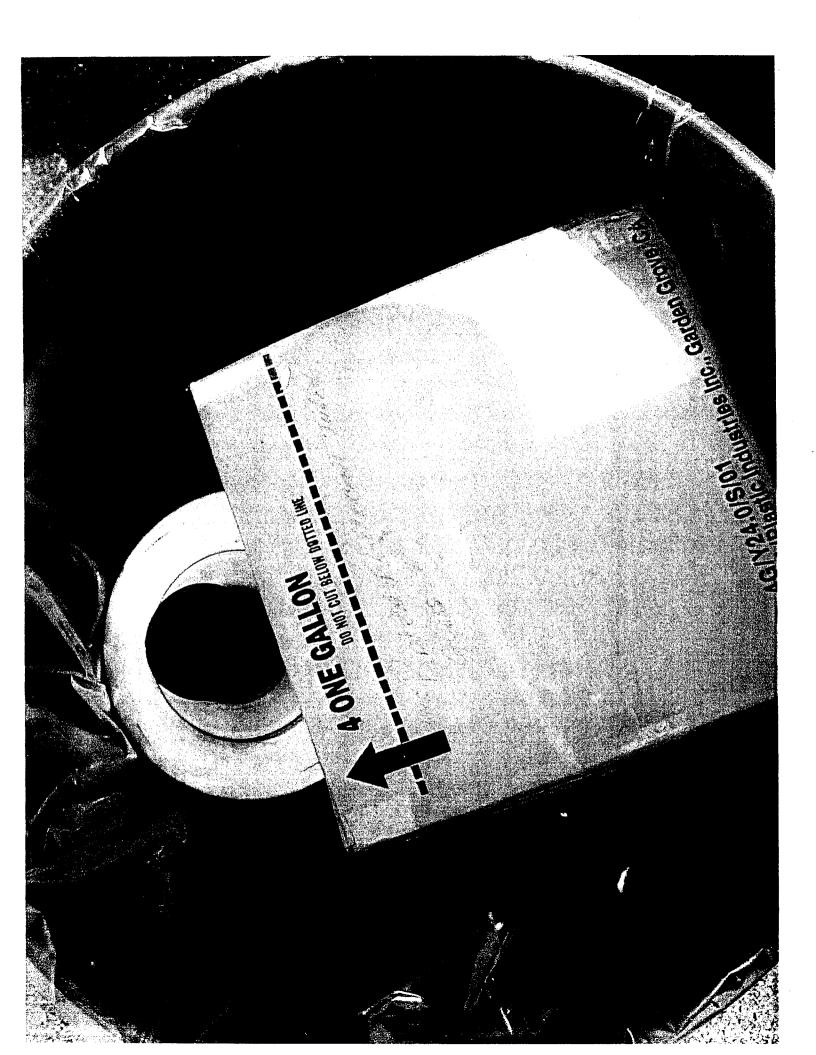




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GeoAnalytical Laboratories, Inc.

1405 Kansas Avenue Modesto, CA 95351

Phone (209) 572-0900 Fax (209) 572-0916

Report # S6F0910

Project: Mercury Sampling

Date:

Date Rec'd:

06/23/06

vorris Industries

³.O. Box 856 350

Giverbank, CA 95367-0856

06/09/06

PO#:

CERTIFICATE OF ANALYSIS

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Date Sampled: 06/09/06

S6F0910-01 ab ID:

Time:

9:00

norganic Chemistry

Sampler: R.M. Carpenter

lethod	RL	Analyte	Result	Units	Notes Analyzed	Batch #
320A	1.0	Mercury	ND	mg/kg	06/23/06	S002178



Date: 7-17-66 PG Mendes, ESL, Accounting, P.O. File

→ RECEIVED ←

JUL 1 7 2006

ENVIRONMENTAL

Donna Keller Laboratory Director

Chemist

GeoAnalytical Laboratories, Inc.

1405 Kansas Avenue Modesto, CA 95351 Phone (209) 572-0900 Fax (209) 572-0916

Report # S6F0910

Project: Mercury Sampling

Date:

06/23/06

Norris Industries

06/09/06

P.O. Box 856 350

Riverbank, CA 95367-0856

PO#:

Date Rec'd:

CERTIFICATE OF ANALYSIS

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_ab ID: norganic Chemistry

S6F0910-03

Date Sampled: 06/09/06

Time:

9:00

Sampler: R.M. Carpenter

lethod	RL	Analyte	Result	Units	Notes	Analyzed	Batch #
020A	0.1	Mercury	0.3	mg/kg		06/23/06	S002178

Chemist

Donna Keller Laboratory Director GeoAnalytical Laboratories, Inc.

1405 Kansas Avenue Modesto, CA 95351 Phone (209) 572-0900 Fax (209) 572-0916

Report # S6F0910

Project: Mercury Sampling

Date: 06/23/06

Norris Industries

PO#

Date Rec'd: 06/09/06

³.O. Box 856 350 Riverbank, CA 95367-0856

> Inorganic Chemistry - Quality Control GeoAnalytical Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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.CS Dup (S002178-BSD1)										
dereury	1,27	0.1	mg/kg	1.25		102	80-120	2	20	

NI INDUSTRIES, INC. RIVERBANK ARMY AMMUNITION PLANT ENVIRONMENTAL SERVICES LABORATORY

5300 CLAUS ROAD RIVERBANK, CALIFORNIA 95367 Phone (209) 529-8100 Fax (209) 869-7285

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SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802: WITHIN CALIFORNIA,

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See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

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1. Additional Descriptions for Moterials Tisied Above 1. SEPSIDE 12025 1. Special Handling Instructions and Additional Information 2.4 IN EMERGENETY: (80.0) 483-3718 SALES ORDERS: CT1209315 TRANS 11 804: DECENTRATOR'S CERTIFICATION: Thereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to explicable international and national government regulations. 18 I am a large quantity generator, Learlity that I have a program in place to reduce the volume and taxicity of waste generated to the degree I have determined to be accommissioned with the way selected the practicable method of irealizable, or disposal currently available to the which minimizes the present and future threat to but unuan head and the divisionment; OR, if I am a small quantity generator. I have made a good faith effort to minimize my waste generation and select the best waste management method that available to me and that I can afford. Signature //original signed by// In Transporter 2 Acknowledgement of Receipt of Materials Frinted/Typed Name //original signed by// Signature //original signed by//	. Coronamoniarine premata	, solid 9, UNG632,	, PG II			J. J		State
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TRUCKE: D2766 TRANS 1: POF: DFOF: N/A GRIDBE 171 CR GG 15 TFE CONTRACTOR FOF TRIS FACILITY VASTE. FLBASE RO AND ENLINE FOR TRANS 1: POF: DFOF: N/A GRIDBE 771 CR GG 15 TFE CONTRACTOR FOF TRIS FACILITY VASTE. FLBASE RO AND ENLINE FOR TRIS FACILITY VASTE. FLBASE RO AND CORRESPONDENCE TO: PO BOX 140 SANIVULLE, VI SI BENERATOR'S CERTIFICATION: I hereby declore that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If i am a large quantity generator, I certify that I have a program in place to reduce the volume and taxicity of waste generated to the degree I have determined to be economical or produced be method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human heads and the environment; CR, if I am a small quantity generator. I have made a good faith effort to minimize my waste generation and select the best waste management method that available to me and that I can afford. Partition of the content of the conten	**************************************				¢.	14100	d.	G,
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19. Discrepancy Indication Space 201 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Signature Signature	Printed/Typed Name / /	/ / Sie	//original signe	ed by//			Mo	nth Day, Yea
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DO NOT WRITE BELOW THIS LINE.

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HK	S DOT Description (Including SPILL RESIDUE, NON-1			nd ID Number)	29. Cont No.	Type	30. Total Quantity	31. Unit Wt/Vo	1 × 100 f
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b.	HAZARDONS WASTE, SO	N.O.S. (MERCUX	2U) 9 12N30	77 PG WT				_	172
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S. Addi	 itional Descriptions for Mater IA0609-NS078 :	rials Listed Above G.		:		T. Han	dling Codes f	or Waste	L s Listed Above
B. N	1A0609-NS018	H. I.		:			a-	.07	
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		gement of Receipt of Mate	erials						Date
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